

Susan M. Coletti (coletti@fr.com) (admitted *pro hac vice*)  
Elizabeth M. Flanagan (eflanagan@fr.com) (admitted *pro hac vice*)  
FISH & RICHARDSON P.C.  
222 Delaware Avenue, 17th Floor  
Wilmington, DE 19899  
Telephone: (302) 652-5070 / Fax: (302) 652-0607

Attorneys for Plaintiffs  
ALLERGAN USA, INC. and ALLERGAN INDUSTRIE, SAS

William F. Cavanaugh (SBN 133461) (wcavanaugh@pbwt.com)  
Scott B. Howard (sbhoward@pbwt.com) (admitted *pro hac vice*)  
William F. Schmedlin (wschmedlin@pbwt.com) (admitted *pro hac vice*)  
PATTERSON BELKNAP WEBB & TYLER LLP  
1133 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 336-2000/ Fax: (212) 336-2222

Attorneys for Defendants  
MEDICIS AESTHETICS, INC., MEDICIS PHARMACEUTICAL CORP.,  
VALEANT PHARMACEUTICALS NORTH AMERICA LLC,  
VALEANT PHARMACEUTICALS INTERNATIONAL,  
VALEANT PHARMACEUTICALS INTERNATIONAL, INC., and  
GALDERMA LABORATORIES, L.P.

SEE ADDITIONAL COUNSEL ON PAGE 2

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALLERGAN USA, INC., and  
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC.,  
MEDICIS PHARMACEUTICAL CORP.,  
VALEANT PHARMACEUTICALS  
NORTH AMERICA LLC,  
VALEANT PHARMACEUTICALS  
INTERNATIONAL,  
VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., and  
GALDERMA LABORATORIES, L.P.

Defendants.

Case No. 8:13-cv-01436 AG (JPRx)

**~~PROPOSED~~ ORDER ON  
STIPULATION FOR CONSENT  
JUDGMENT AND DISMISSAL**

Jonathan E. Singer (CA Bar No. 187908) (singer@fr.com)  
Michael J. Kane (kane@fr.com) (admitted *pro hac vice*)  
Phillip W. Goter (goter@fr.com) (admitted *pro hac vice*)  
FISH & RICHARDSON P.C.  
60 South Sixth Street, Suite 3200  
Minneapolis, MN 55402  
Telephone: (612) 335-5070 / Fax: (612) 288-9696

Juanita R. Brooks (CA Bar No. 75934) (brooks@fr.com)  
Lara S. Garner (CA Bar No. 234701) (lgarner@fr.com)  
FISH & RICHARDSON P.C.  
12390 El Camino Real  
San Diego, CA 92130  
Telephone: (858) 678-5070 / Fax: (858) 678-5099

Craig E. Countryman (CA Bar No. 244601) (countryman@fr.com)  
FISH & RICHARDSON P.C.  
555 W. 5th Street, 31st Floor  
Los Angeles, California 90013  
Telephone: (213) 533-4240 / Fax: (213) 996-8304

Attorneys for Plaintiffs  
ALLERGAN USA, INC. and ALLERGAN INDUSTRIE, SAS

Donald G. Norris (SBN 90000) (dnorris@norgallaw.com)  
Douglas F. Galanter (SBN 93740) (dgalanter@norgallaw.com)  
NORRIS & GALANTER LLP  
523 W. Sixth St., Suite 716  
Los Angeles, CA 90014  
Tel: 213-232-0855 / Fax: 213-286-9499  
dnorris@norgallaw.com  
dgalanter@norgallaw.com

Attorneys for Defendants  
MEDICIS AESTHETICS, INC., MEDICIS PHARMACEUTICAL CORP.,  
VALEANT PHARMACEUTICALS NORTH AMERICA LLC,  
VALEANT PHARMACEUTICALS INTERNATIONAL,  
VALEANT PHARMACEUTICALS INTERNATIONAL, INC., and  
GALDERMA LABORATORIES, L.P.



1 Before the Court is the Stipulation for Consent Judgment and Dismissal of  
 2 Plaintiffs Allergan USA Inc. and Allergan Industrie, SAS ("Allergan"), and  
 3 Defendants Galderma Laboratories, L.P. ("Galderma") and Medicis Aesthetics, Inc.,  
 4 Medicis Pharmaceutical Corp., Valeant Pharmaceuticals North America LLC,  
 5 Valeant Pharmaceuticals International, and Valeant Pharmaceuticals International,  
 6 Inc. (collectively "Valeant").

7 The Court being of the opinion that said stipulation should be GRANTED, it  
 8 is hereby ORDERED, ADJUDGED and DECREED that all claims or causes of  
 9 action asserted in this suit by and between Allergan and Galderma are hereby  
 10 dismissed with prejudice.

11 It is further ORDERED, ADJUDGED and DECREED that all claims or  
 12 causes of action asserted in this suit by and between Allergan and Valeant are  
 13 hereby dismissed with prejudice.

14 It is further ORDERED that, as stipulated and pursuant to Fed. R. Civ. P. 65,  
 15 Galderma, including its Affiliates, Agents, Successors, and Assigns, is hereby  
 16 enjoined from making, importing, using, offering to sell, or selling the Emervel®  
 17 family of products containing lidocaine ("Emervel Lidocaine Products") in the  
 18 United States before January 1, 2016, except that this injunction shall not prohibit  
 19 Galderma or its Affiliates, Agents, Successors, and Assigns at any time from (1)  
 20 importing into the Territory, or having imported into the Territory Emervel  
 21 Lidocaine Products so long as the Emervel Lidocaine Products are not offered for  
 22 sale or sold in the Territory prior to January 1, 2016, (2) training its sales force,  
 23 including any independent contractors, on the marketing of Emervel Lidocaine  
 24 Products, (3) preparing and having prepared marketing materials for Emervel  
 25 Lidocaine Products, and (4) conducting or having conducted clinical trials of  
 26 Emervel Lidocaine Products in the Territory. Emervel Lidocaine Products imported  
 27 into the Territory pursuant to subsection (1) may be stored at a warehouse owned or

9 → NOT IN STIPULATION

1 ~~operated by a third party distributor so long as the Emervel Lidocaine Products are~~  
2 ~~not sold, offered for sale or used by any Third Party in the United States prior to~~  
3 ~~January 1, 2016.~~

4 It is further ORDERED that each party shall bear its own costs, expenses and  
5 attorneys' fees.

6 ~~It is further ORDERED that the Court shall retain exclusive jurisdiction~~  
7 ~~to resolve any dispute between the parties relating to the parties' Settlement and~~  
8 ~~License Agreement.~~

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10 IT IS SO ORDERED THIS 12 day of JUNE, 2015.

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14 HONORABLE ANDREW J. GUILFORD  
15 UNITED STATES DISTRICT JUDGE  
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